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U.S. DISTRICT COURT  
NO. DIST. OF CA. S.J.

E-FILING

1 Mike McKool, Jr. (*pro hac vice* application filed)  
2 Douglas Cawley (*pro hac vice* application filed)  
3 MCKOOL SMITH P.C.

300 Crescent Court

3 Suite 1500

4 Dallas, Texas 75201

5 Telephone: (214) 978-4000

6 Facsimile: (214) 978-4044

7 Email: mmckool@mckoolsmith.com;

8 dcawley@mckoolsmith.com

9 Scott L. Cole (*pro hac vice* application filed)  
10 Pierre J. Hubert (*pro hac vice* application filed)  
11 Craig N. Tolliver (*pro hac vice* application filed)

12 MCKOOL SMITH P.C.

13 300 W. 6<sup>th</sup> Street

14 Suite 1700

15 Austin, Texas 78701

16 Telephone: (512) 692-8700

17 Facsimile: (512) 692-8744

18 Email: scole@mckoolsmith.com;

19 phubert@mckoolsmith.com;

20 ctolliver@mckoolsmith.com

21 Julie S. Turner (State Bar No. 191146)

22 THE TURNER LAW FIRM

23 344 Tennessee Lane

24 Palo Alto, California 94306

25 Telephone: (650) 494-1530

26 Facsimile: (650) 472-8028

27 Email: jturner@julietturnerlaw.com

28 Attorneys for Plaintiff

RAMBUS INC.

McKOOL SMITH P.C.  
300 Crescent Court, Suite 1500  
Dallas, TX 75201

ORIGINAL

22 RAMBUS INC.,

23 Plaintiff,

24 v.

25 NVIDIA CORPORATION,

26 Defendant.

27  
28 C 08 03343  
Case No. JCSCOMPLAINT FOR PATENT  
INFRINGEMENT  
AND JURY DEMAND

FAXED

Complaint for Patent Infringement  
and Jury Demand

1 Plaintiff Rambus Inc. states the following as its Complaint against defendant NVIDIA  
2 Corporation.

3 **THE PARTIES**

4 1. Rambus Inc. ("Rambus") is a corporation organized and existing under the laws  
5 of Delaware, with its principal place of business in Los Altos, California. Rambus is a  
6 technology leader in developing memory interface solutions that enable higher performance and  
7 system bandwidth for a broad range of electronic, computing and networking applications for  
8 consumers and businesses. Rambus's interface products and technology enable state-of-the-art  
9 performance for users of PCs, video game consoles, printers, digital TVs, set-top boxes, video  
10 projectors, network switches and routers.

11 2. Upon information and belief, defendant NVIDIA Corporation ("NVIDIA" or  
12 "Defendant") is a corporation organized and existing under the laws of Delaware, with its  
13 headquarters located at 2701 San Tomas Expressway, Santa Clara, California, 95050. Upon  
14 information and belief, NVIDIA transacts substantial business, either directly or through its  
15 agent, on an ongoing basis in this judicial district and elsewhere in the United States.

16 3. Unless specifically stated otherwise, the acts complained of herein were  
17 committed by, on behalf of, and/or for the benefit of Defendant.

18 **NATURE OF THE ACTION**

19 4. This is an action for patent infringement.

20 5. On information and belief, NVIDIA has been and is infringing, contributing to the  
21 infringement of, and/or actively inducing others to infringe Rambus' U.S. Patent No. 7,209,997  
22 ("the '997 Patent"), U.S. Patent No. 6,751,696 ("the '696 Patent"), U.S. Patent No. 6,564,281  
23 ("the '281 Patent"), U.S. Patent No. 6,496,897 ("the '897 Patent"), U.S. Patent No. 6,493,789  
24 ("the '789 Patent"), U.S. Patent No. 6,470,405 ("the '405 Patent"), U.S. Patent No. 7,287,109  
25 ("the '109 Patent"), U.S. Patent No. 7,330,952 ("the '952 Patent"), U.S. Patent No. 7,330,953  
26 ("the '953 Patent"), U.S. Patent No. 7,360,050 ("the '050 Patent"), U.S. Patent No. 7,287,119  
27 ("the '119 Patent"), U.S. Patent No. 7,210,016 ("the '016 Patent"), U.S. Patent No. 7,177,998  
28 ("the '998 Patent"), U.S. Patent No. 6,591,353 ("the '353 Patent"), U.S. Patent No. 6,260,097

1 ("the '097 Patent"), U.S. Patent No. 6,304,937 ("the '937 Patent") and/or U.S. Patent No.  
2 6,715,020 ("the '020 Patent"). The patents identified in this paragraph are referred to herein as  
3 the "Rambus Patents."

4 **JURISDICTION AND VENUE**

5 6. This action arises under the Patent Laws of the United States, 35 U.S.C. § 1 *et*  
6 *seq.*, including 35 U.S.C. § 271. This Court has subject matter jurisdiction pursuant to 28 U.S.C.  
7 §§ 1331 and 1338(a).

8 7. This Court has personal jurisdiction over Defendant because Defendant conducts  
9 business in the State of California and in this judicial district, and has been infringing,  
10 contributing to the infringement of and/or actively inducing others to infringe the Rambus  
11 Patents as alleged below.

12 8. Venue is proper in this Court pursuant to 28 U.S.C. §§ 1391(b), 1391(c), 1391(d)  
13 and/or 1400(b) because, upon information and belief, a substantial part of the events giving rise  
14 to Rambus' claims occurred in the Northern District of California and because Defendant is  
15 either resident in or otherwise subject to personal jurisdiction in the Northern District of  
16 California.

17 **INTRADISTRICT ASSIGNMENT**

18 9. Assignment of this action on a district-wide basis is appropriate because this is an  
19 Intellectual Property Action. Assignment to the San Jose Division of the U.S. District Court for  
20 the Northern District of California would be appropriate because a substantial part of the events  
21 and damages giving rise to the action occurred in the San Jose Division, because Rambus's  
22 principal place of business is located in Santa Clara County within the San Jose Division, and  
23 because defendant NVIDIA's headquarters is located in Santa Clara County within the San Jose  
24 Division.

25  
26 **FACTUAL BACKGROUND**

27 10. Rambus is one of the world's leading designers of memory interface technologies  
28 used in computers, consumer electronics and network systems. Rambus licenses its technologies

1 to various customers, who then incorporate them into various products, including memory  
2 controllers, memory components, memory modules and memory systems.

3       11. Upon information and belief, NVIDIA has made, used, sold, imported and/or  
4 offered for sale, and/or continues to make, use, sell, import and/or offer for sale, products in the  
5 United States consisting of or including SDR (Single Data Rate) memory controllers, DDR  
6 (Double Data Rate) memory controllers, DDRx memory controllers (where DDRx includes at  
7 least DDR2 and DDR3), GDDR (Graphics Double Data Rate) memory controllers, and/or  
8 GDDRy memory controllers (where GDDRy includes at least GDDR3) (collectively "Accused  
9 Products"). Accused Products include chipsets, graphics processors, media communication  
10 processors, multimedia applications processors and/or products that are part of NVIDIA's  
11 "GeForce," "Quadro," "nForce," "Tesla," "Tegra" and/or "GoForce" product lines.

12       12. On April 24, 2007, U.S. Patent No. 7,209,997, entitled "Controller Device and  
13 Method for Operating Same," was duly and legally issued to Rambus, as assignee of the  
14 inventors named therein. A true and correct copy of the '997 Patent is attached as Exhibit A and  
15 incorporated herein by reference.

16       13. On June 15, 2004, U.S. Patent No. 6,751,696, entitled "Memory Device Having a  
17 Programmable Register," was duly and legally issued to Rambus, as assignee of the inventors  
18 named therein. A true and correct copy of the '696 Patent is attached as Exhibit B and  
19 incorporated herein by reference.

20       14. On May 13, 2003, U.S. Patent No. 6,564,281, entitled "Synchronous Memory  
21 Device Having Automatic Precharge," was duly and legally issued to Rambus, as assignee of the  
22 inventors named therein. A true and correct copy of the '281 Patent is attached as Exhibit C and  
23 incorporated herein by reference.

24       15. On December 17, 2002, U.S. Patent No. 6,496,897, entitled "Semiconductor  
25 Memory Device Which Receives Write Masking Information," was duly and legally issued to  
26 Rambus, as assignee of the inventors named therein. A true and correct copy of the '897 Patent  
27 is attached as Exhibit D and incorporated herein by reference.

28

1       16. On December 10, 2002, U.S. Patent No. 6,493,789, entitled "Memory Device  
2 Which Receives Write Masking and Automatic Precharge Information," was duly and legally  
3 issued to Rambus, as assignee of the inventors named therein. A true and correct copy of the  
4 '789 Patent is attached as Exhibit E and incorporated herein by reference.

5       17. On October 22, 2002, U.S. Patent No. 6,470,405, entitled "Protocol for  
6 Communication with Dynamic Memory," was duly and legally issued to Rambus, as assignee of  
7 the inventors named therein. A true and correct copy of the '405 Patent is attached as Exhibit F  
8 and incorporated herein by reference.

9       18. On October 23, 2007, U.S. Patent No. 7,287,109, entitled "Method of Controlling  
10 a Memory Device Having a Memory Core," was duly and legally issued to Rambus, as assignee  
11 of the inventors named therein. A true and correct copy of the '109 Patent is attached as Exhibit  
12 G and incorporated herein by reference.

13       19. On February 12, 2008, U.S. Patent No. 7,330,952, entitled "Integrated Circuit  
14 Memory Device Having Delayed Write Timing Based on Read Response Time," was duly and  
15 legally issued to Rambus, as assignee of the inventors named therein. A true and correct copy of  
16 the '952 Patent is attached as Exhibit H and incorporated herein by reference.

17       20. On February 12, 2008, U.S. Patent No. 7,330,953, entitled "Memory System  
18 Having Delayed Write Timing," was duly and legally issued to Rambus, as assignee of the  
19 inventors named therein. A true and correct copy of the '953 Patent is attached as Exhibit I and  
20 incorporated herein by reference.

21       21. On April 15, 2008, U.S. Patent No. 7,360,050, entitled "Integrated Circuit  
22 Memory Device Having Delayed Write Capability," was duly and legally issued to Rambus, as  
23 assignee of the inventors named therein. A true and correct copy of the '050 Patent is attached  
24 as Exhibit J and incorporated herein by reference.

25       22. On October 23, 2007, U.S. Patent No. 7,287,119, entitled "Integrated Circuit  
26 Memory Device with Delayed Write Command Processing," was duly and legally issued to  
27 Rambus, as assignee of the inventors named therein. A true and correct copy of the '119 Patent  
28 is attached as Exhibit K and incorporated herein by reference.

1       23. On April 24, 2007, U.S. Patent No. 7,210,016, entitled "Method, System and  
2 Memory Controller Utilizing Adjustable Write Data Delay Settings," was duly and legally issued  
3 to Rambus, as assignee of the inventors named therein. A true and correct copy of the '016  
4 Patent is attached as Exhibit L and incorporated herein by reference.

5       24. On February 13, 2007, U.S. Patent No. 7,177,998, entitled "Method, System and  
6 Memory Controller Utilizing Adjustable Read Data Delay Settings," was duly and legally issued  
7 to Rambus, as assignee of the inventors named therein. A true and correct copy of the '998  
8 Patent is attached as Exhibit M and incorporated herein by reference.

9       25. On July 8, 2003, U.S. Patent No. 6,591,353, entitled "Protocol for  
10 Communication with Dynamic Memory," was duly and legally issued to Rambus, as assignee of  
11 the inventors named therein. A true and correct copy of the '353 Patent is attached as Exhibit N  
12 and incorporated herein by reference.

13       26. On July 10, 2001, U.S. Patent No. 6,260,097, entitled "Method and Apparatus for  
14 Controlling a Synchronous Memory Device," was duly and legally issued to Rambus, as  
15 assignee of the inventors named therein. A true and correct copy of the '097 Patent is attached  
16 as Exhibit O and incorporated herein by reference.

17       27. On October 16, 2001, U.S. Patent No. 6,304,937, entitled "Method of Operation  
18 of a Memory Controller," was duly and legally issued to Rambus, as assignee of the inventors  
19 named therein. A true and correct copy of the '937 Patent is attached as Exhibit P and  
20 incorporated herein by reference.

21       28. On March 30, 2004, U.S. Patent No. 6,715,020, entitled "Synchronous Integrated  
22 Circuit Device," was duly and legally issued to Rambus, as assignee of the inventors named  
23 therein. A true and correct copy of the '020 Patent is attached as Exhibit Q and incorporated  
24 herein by reference.

25       29. At all relevant times, Rambus has been the owner of the entire right, title, and  
26 interest in each of the Rambus Patents.

27

28

1       30.     Rambus is entitled to recover from Defendant the actual damages sustained by  
2 Rambus as a result of Defendant's wrongful acts alleged herein under 35 U.S.C. § 284 in an  
3 amount to be proven at trial, together with interest and costs.

4       31. Upon information and belief, Defendant's infringement of the Rambus Patents as  
5 set forth herein has been and is willful, deliberate and in disregard of Rambus' patent rights, and  
6 Rambus is therefore entitled to increased damages up to three times the amount of actual  
7 damages and attorneys' fees, pursuant to 35 U.S.C. §§ 284 and 285.

8        32.    Defendant's infringement of the Rambus Patents will continue to damage  
9 Rambus, causing irreparable harm for which there is no adequate remedy at law, unless it is  
10 enjoined by this Court.

**COUNT I**

**(Patent Infringement of U.S. Patent No. 7,209,997  
Under 35 U.S.C. § 271, *et. seq.*)**

13 33. Rambus incorporates by reference and realleges paragraphs 1 through 32 above as  
14 though fully restated herein.

15        34. Upon information and belief, Defendant (1) has infringed and continues to  
16 infringe the '997 Patent, literally and/or under the doctrine of equivalents, by making, using,  
17 offering to sell, selling, and/or importing, directly and/or through intermediaries, Accused  
18 Products consisting of or including at least SDR, DDR, DDR2, DDR3, GDDR and/or GDDR3  
19 memory controllers, in this district and elsewhere in the United States, and/or (2) has contributed  
20 and continues to contribute to the literal infringement and/or infringement under the doctrine of  
21 equivalents of the '997 Patent, and/or has actively induced and continues to actively induce  
22 others to infringe the '997 Patent, literally and/or under the doctrine of equivalents, in this  
23 district and elsewhere in the United States.

**COUNT II**

**(Patent Infringement of U.S. Patent No. 6,751,696  
Under 35 U.S.C. § 271, et. seq.)**

26 35. Rambus incorporates by reference and realleges paragraphs 1 through 34 above as  
27 though fully restated herein.

1       36. Upon information and belief, Defendant (1) has infringed and continues to  
2 infringe the '696 Patent, literally and/or under the doctrine of equivalents, by making, using,  
3 offering to sell, selling, and/or importing, directly and/or through intermediaries, Accused  
4 Products consisting of or including at least DDR, DDR2, DDR3, GDDR and/or GDDR3 memory  
5 controllers, in this district and elsewhere in the United States, and/or (2) has contributed and  
6 continues to contribute to the literal infringement and/or infringement under the doctrine of  
7 equivalents of the '696 Patent, and/or has actively induced and continues to actively induce  
8 others to infringe the '696 Patent, literally and/or under the doctrine of equivalents, in this  
9 district and elsewhere in the United States.

### COUNT III

**(Patent Infringement of U.S. Patent No. 6,564,281  
Under 35 U.S.C. § 271, *et. seq.*)**

12 37. Rambus incorporates by reference and realleges paragraphs 1 through 36 above as  
13 though fully restated herein.

14        38. Upon information and belief, Defendant (1) has infringed and continues to  
15 infringe the '281 Patent, literally and/or under the doctrine of equivalents, by making, using,  
16 offering to sell, selling, and/or importing, directly and/or through intermediaries, Accused  
17 Products consisting of or including at least SDR, DDR, DDR2, DDR3, GDDR and/or GDDR3  
18 memory controllers, in this district and elsewhere in the United States, and/or (2) has contributed  
19 and continues to contribute to the literal infringement and/or infringement under the doctrine of  
20 equivalents of the '281 Patent, and/or has actively induced and continues to actively induce  
21 others to infringe the '281 Patent, literally and/or under the doctrine of equivalents, in this  
22 district and elsewhere in the United States.

**COUNT IV**

**(Patent Infringement of U.S. Patent No. 6,496,897  
Under 35 U.S.C. § 271, *et. seq.*)**

25 39. Rambut incorporates by reference and realleges paragraphs 1 through 38 above as  
26 though fully restated herein.

27 40. Upon information and belief, Defendant (1) has infringed and continues to  
28 infringe the '897 Patent, literally and/or under the doctrine of equivalents, by making, using,

1 offering to sell, selling, and/or importing, directly and/or through intermediaries, Accused  
 2 Products consisting of or including at least DDR, DDR2, DDR3, GDDR and/or GDDR3 memory  
 3 controllers, in this district and elsewhere in the United States, and/or (2) has contributed and  
 4 continues to contribute to the literal infringement and/or infringement under the doctrine of  
 5 equivalents of the '897 Patent, and/or has actively induced and continues to actively induce  
 6 others to infringe the '897 Patent, literally and/or under the doctrine of equivalents, in this  
 7 district and elsewhere in the United States.

8 **COUNT V**

9 **(Patent Infringement of U.S. Patent No. 6,493,789  
 Under 35 U.S.C. § 271, *et. seq.*)**

10 41. Rambus incorporates by reference and realleges paragraphs 1 through 40 above as  
 11 though fully restated herein.

12 42. Upon information and belief, Defendant (1) has infringed and continues to  
 13 infringe the '789 Patent, literally and/or under the doctrine of equivalents, by making, using,  
 14 offering to sell, selling, and/or importing, directly and/or through intermediaries, Accused  
 15 Products consisting of or including at least DDR, DDR2, DDR3, GDDR and/or GDDR3 memory  
 16 controllers, in this district and elsewhere in the United States, and/or (2) has contributed and  
 17 continues to contribute to the literal infringement and/or infringement under the doctrine of  
 18 equivalents of the '789 Patent, and/or has actively induced and continues to actively induce  
 19 others to infringe the '789 Patent, literally and/or under the doctrine of equivalents, in this  
 20 district and elsewhere in the United States.

21 **COUNT VI**

22 **(Patent Infringement of U.S. Patent No. 6,470,405  
 Under 35 U.S.C. § 271, *et. seq.*)**

23 43. Rambus incorporates by reference and realleges paragraphs 1 through 42 above as  
 24 though fully restated herein.

25 44. Upon information and belief, Defendant (1) has infringed and continues to  
 26 infringe the '405 Patent, literally and/or under the doctrine of equivalents, by making, using,  
 27 offering to sell, selling, and/or importing, directly and/or through intermediaries, Accused  
 28 Products consisting of or including at least DDR2, DDR3 and/or GDDR3 memory controllers, in

1 this district and elsewhere in the United States, and/or (2) has contributed and continues to  
 2 contribute to the literal infringement and/or infringement under the doctrine of equivalents of the  
 3 '405 Patent, and/or has actively induced and continues to actively induce others to infringe the  
 4 '405 Patent, literally and/or under the doctrine of equivalents, in this district and elsewhere in the  
 5 United States.

6 **COUNT VII**

7 (Patent Infringement of U.S. Patent No. 7,287,109  
 Under 35 U.S.C. § 271, *et. seq.*)

8 45. Rambus incorporates by reference and realleges paragraphs 1 through 44 above as  
 9 though fully restated herein.

10 46. Upon information and belief, Defendant (1) has infringed and continues to  
 11 infringe the '109 Patent, literally and/or under the doctrine of equivalents, by making, using,  
 12 offering to sell, selling, and/or importing, directly and/or through intermediaries, Accused  
 13 Products consisting of or including at least DDR2, DDR3 and/or GDDR3 memory controllers, in  
 14 this district and elsewhere in the United States, and/or (2) has contributed and continues to  
 15 contribute to the literal infringement and/or infringement under the doctrine of equivalents of the  
 16 '109 Patent, and/or has actively induced and continues to actively induce others to infringe the  
 17 '109 Patent, literally and/or under the doctrine of equivalents, in this district and elsewhere in the  
 18 United States.

19 **COUNT VIII**

20 (Patent Infringement of U.S. Patent No. 7,330,952  
 Under 35 U.S.C. § 271, *et. seq.*)

21 47. Rambus incorporates by reference and realleges paragraphs 1 through 46 above as  
 22 though fully restated herein.

23 48. Upon information and belief, Defendant (1) has infringed and continues to  
 24 infringe the '952 Patent, literally and/or under the doctrine of equivalents, by making, using,  
 25 offering to sell, selling, and/or importing, directly and/or through intermediaries, Accused  
 26 Products consisting of or including at least DDR2 and/or DDR3 memory controllers, in this  
 27 district and elsewhere in the United States, and/or (2) has contributed and continues to contribute  
 28 to the literal infringement and/or infringement under the doctrine of equivalents of the '952

1 Patent, and/or has actively induced and continues to actively induce others to infringe the '952  
 2 Patent, literally and/or under the doctrine of equivalents, in this district and elsewhere in the  
 3 United States.

4 **COUNT IX**

5 (Continuation of infringement of U.S. Patent No. 7,330,953  
 6 under 35 U.S.C. § 271, *et. seq.*)

7 49. Rambus, Inc. hereby reclaims by reference and realleges paragraphs 1 through 48 above as  
 8 though fully restated herein.

9 50. Upon information and belief, Defendant (1) has infringed and continues to  
 10 infringe the '953 Patent, literally and/or under the doctrine of equivalents, by making, using,  
 11 offering to sell, selling, and/or advertising, directly and/or through intermediaries, Accused  
 12 Products consisting of or including at least DDR2 and/or DDR3 memory controllers, in this  
 13 district and elsewhere in the United States, and/or (2) has contributed and continues to contribute  
 14 to the literal infringement and/or infringement under the doctrine of equivalents of the '953  
 15 Patent, and/or has actively induced and continues to actively induce others to infringe the '953  
 16 Patent, literally and/or under the doctrine of equivalents, in this district and elsewhere in the  
 17 United States.

18 **COUNT X**

19 (Continuation of infringement of U.S. Patent No. 7,360,050  
 20 under 35 U.S.C. § 271, *et. seq.*)

21 51. Rambus, Inc. hereby reclaims by reference and realleges paragraphs 1 through 50 above as  
 22 though fully restated herein.

23 52. Upon information and belief, Defendant (1) has infringed and continues to  
 24 infringe the '050 Patent, literally and/or under the doctrine of equivalents, by making, using,  
 25 offering to sell, selling, and/or advertising, directly and/or through intermediaries, Accused  
 26 Products consisting of or including at least DDR2 and/or DDR3 memory controllers, in this  
 27 district and elsewhere in the United States, and/or (2) has contributed and continues to contribute  
 28 to the literal infringement and/or infringement under the doctrine of equivalents of the '050  
 Patent, and/or has actively induced and continues to actively induce others to infringe the '050

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 300 Crescent Court, Suite 1500  
 Dallas, TX 75201

1 Patent, literally and/or under the doctrine of equivalents, in this district and elsewhere in the  
 2 United States.

3 **COUNT XI**

4 (Continuing from Count I, Patent Infringement of U.S. Patent No. 7,287,119  
 Under 35 U.S.C. § 271, *et. seq.*)

5 53. Rambus *et. al.* reiterates by reference and realleges paragraphs 1 through 52 above as  
 6 though fully restated.

7 54. Upon information and belief, Defendant (1) has infringed and continues to  
 8 infringe the '119 Patent, literally and/or under the doctrine of equivalents, by making, using,  
 9 offering to sell, selling, and/or importing, directly and/or through intermediaries, Accused  
 10 Products consisting of at least DDR2 and/or DDR3 memory controllers, in this  
 11 district and elsewhere in the United States, and/or (2) has contributed and continues to contribute  
 12 to the literal infringement and/or infringement under the doctrine of equivalents of the '119  
 13 Patent, and/or has actively induced others to infringe the '119 Patent, and continues to actively induce others to infringe the '119  
 14 Patent, literally and/or under the doctrine of equivalents, in this district and elsewhere in the  
 15 United States.

16 **COUNT XII**

17 (Continuing from Count I, Patent Infringement of U.S. Patent No. 7,210,016  
 Under 35 U.S.C. § 271, *et. seq.*)

18 55. Rambus *et. al.* reiterates by reference and realleges paragraphs 1 through 54 above as  
 19 though fully restated.

20 56. Upon information and belief, Defendant (1) has infringed and continues to  
 21 infringe the '016 Patent, literally and/or under the doctrine of equivalents, by making, using,  
 22 offering to sell, selling, and/or importing, directly and/or through intermediaries, Accused  
 23 Products consisting of at least DDR3 memory controllers, in this district and  
 24 elsewhere in the United States, and/or (2) has contributed and continues to contribute to the  
 25 literal infringement and/or infringement under the doctrine of equivalents of the '016 Patent,  
 26 and/or has actively induced others to infringe the '016 Patent, and continues to actively induce others to infringe the '016 Patent,  
 27 literally and/or under the doctrine of equivalents, in this district and elsewhere in the United  
 28 States.

McKOOL SMITH P.C.  
 300 Crescent Court, Suite 1500  
 Dallas, TX 75201

### COUNT XIII

**Infringement of U.S. Patent No. 7,177,998  
Under 35 U.S.C. § 271, *et. seq.*)**

57. Rambus

ates by reference and realleges paragraphs 1 through 56 above as

58. Upon infringement the '998 Patent by offering to sell, selling Products consisting of elsewhere in the United States, literal infringement and/or has actively induced literally and/or unduly the States.

on and belief, Defendant (1) has infringed and continues to  
ly and/or under the doctrine of equivalents, by making, using,  
importing, directly and/or through intermediaries, Accused  
ding at least DDR3 memory controllers, in this district and  
, and/or (2) has contributed and continues to contribute to the  
ingement under the doctrine of equivalents of the '998 Patent,  
J continues to actively induce others to infringe the '998 Patent,  
ine of equivalents, in this district and elsewhere in the United

## COUNT XIV

**Infringement of U.S. Patent No. 6,591,353  
Under 35 U.S.C. § 271, *et. seq.*)**

59. Rambl.

orates by reference and realleges paragraphs 1 through 58 above as

on and belief, Defendant (1) has infringed and continues to  
il and/or under the doctrine of equivalents, by making, using,  
importing, directly and/or through intermediaries, Accused  
ding at least DDR2, DDR3 and/or GDDR3 memory controllers, in  
the United States, and/or (2) has contributed and continues to  
ement and/or infringement under the doctrine of equivalents of the  
y induced and continues to actively induce others to infringe the  
nder the doctrine of equivalents, in this district and elsewhere in the

**McKOOL SMITH P.C.**  
300 Crescent Court, Suite 1500  
Dallas, TX 75201

## COUNT XV

**Patent Infringement of U.S. Patent No. 6,260,097  
Under 35 U.S.C. § 271, *et. seq.*)**

61. Rambus incorporates by reference and realleges paragraphs 1 through 60 above as though fully restated herein.

62. Upon information and belief, Defendant (1) has infringed and continues to infringe the '097 Patent, literally and/or under the doctrine of equivalents, by making, using, offering to sell, selling, and/or importing, directly and/or through intermediaries, Accused Products consisting of controllers, in this district and elsewhere in the United States, and/or (2) has contributed and continues to contribute to literal infringement and/or infringement under the doctrine of equivalents of the '097 Patent, and/or has actively induced and continues to actively induce others to infringe the '097 Patent, literally and/or under the doctrine of equivalents, in this district and elsewhere in the United States.

## **COUNT XVI**

**Infringement of U.S. Patent No. 6,304,937  
Under 35 U.S.C. § 271, *et. seq.*)**

63. Plaintiff incorporates by reference and realleges paragraphs 1 through 62 above as though fully restated.

64. Upon information and belief, Defendant (1) has infringed and continues to infringe the '937 Patent by making, using, offering to sell, and/or selling at least DDR, DDR2, DDR3, GDDR and/or GDDR3 memory products consisting of memory controllers, in the United States, and/or elsewhere in the United States, and/or (2) has contributed and continues to contribute to literal infringement and/or infringement under the doctrine of equivalents of the '937 Patent, and/or has actively induced and continues to actively induce others to infringe the '937 Patent, literally and/or under the doctrine of equivalents, in this district and elsewhere in the United States.

**COUNT XVII**

(pertaining to Infringement of U.S. Patent No. 6,715,020  
Under 35 U.S.C. § 271, *et. seq.*)

16. Rambus incorporates by reference and realleges paragraphs 1 through 64 above as  
17. though fully restated herein.

18. Upon information and belief, Defendant (1) has infringed and continues to  
19. infringe the '020 Patent, literally and/or under the doctrine of equivalents, by making, using,  
20. offering to sell, selling and/or importing, directly and/or through intermediaries, Accused  
21. Products consisting of, including at least SDR, DDR, DDR2, DDR3, GDDR and/or GDDR3  
22. memory controllers, in this District and elsewhere in the United States, and/or (2) has contributed  
23. and continues to contribute to the literal infringement and/or infringement under the doctrine of  
24. equivalents of the '020 Patent, and/or has actively induced and continues to actively induce  
25. others to infringe the '020 Patent, literally and/or under the doctrine of equivalents, in this  
26. district and elsewhere in the United States.

**PRAYER FOR RELIEF**

27. WHEREFORE, Rambus asks this Court to enter judgment in its favor against NVIDIA  
28. and grant the following:

29. (a) Judgment that NVIDIA has infringed and continues to infringe the  
30. Rambus Patent, willfully; and  
31. (b) Judgment in the amount of all damages sustained by Rambus as a result of  
32. NVIDIA's acts of infringement; and  
33. (c) Judgment in the amount of Rambus of actual damages adequate to compensate Rambus  
34. for NVIDIA's acts of infringement, together with prejudgment and postjudgment interest;  
35. (d) Judgment in the amount of Rambus of enhanced damages, up to and including trebling  
36. of Rambus' damages, pursuant to 35 U.S.C. § 284 for NVIDIA's willful infringement;  
37. (e) Judgment in the amount of Rambus' costs of suit and reasonable attorneys' fees pursuant  
38. to 35 U.S.C. § 285, including the exceptional nature of this case, or as otherwise permitted by law;

McKOOL SMITH P.C.  
300 Crescent Court, Suite 1500  
Dallas, TX 75201

7 further relief that this Court deems just and proper.

Respectfully submitted,

10 | DATED: 10/10/2018

MCKOOL SMITH P.C.  
THE TURNER LAW FIRM

By: Julie S. Turner

Attorneys for Plaintiff  
RAMBUS INC.

**McKOOL SMITH P.C.**  
800 Crescent Court, Suite 1500  
Dallas TX 75201

**DEMAND FOR A JURY TRIAL**

First, to the revisions of Rule 38(b) of the Federal Rules of Civil Procedure and in accordance with Civil Local Rule 3-6, Rambus demands a trial by jury of all issues so triable in this matter.

Respectfully submitted,

DATE: Oct. 1, 2014

MCKOOL SMITH P.C.

## THE TURNER LAW FIRM

By: Julie S. Turner

At~~te~~orneys for Plaintiff  
RAMBUS INC.

**McKOOL SMITH P.C.**  
300 Crescent Court, Suite 1500  
Dallas, TX 75201